SETTLEMENT DATE AND TIME: May 15, 2014 at 12:00 noon (Eastern Time) OBJECTION DATE AND TIME: May 15, 2014 at 11:30 a.m. (Eastern Time)

KING & SPALDING LLP

1185 Avenue of the Americas

New York, New York 10036

Telephone: (212) 556-2100 Facsimile: (212) 556-2222

Arthur Steinberg Scott Davidson

KIRKLAND & ELLIS LLP

300 North LaSalle

Chicago, IL 60654

Telephone: (312) 862-2000 Facsimile: (312) 862-2200

Richard C. Godfrey, P.C. (admitted *pro hac vice*) Andrew B. Bloomer, P.C. (admitted *pro hac vice*)

Attorneys for General Motors LLC

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

Chapter 11 In re MOTORS LIQUIDATION COMPANY, et al., Case No.: 09-50026 (REG) f/k/a General Motors Corp., et al. (Jointly Administered) Debtors. STEVEN GROMAN, ROBIN DELUCO, ELIZABETH Y. GRUMET, ABC FLOORING, INC., MARCUS SULLIVAN, KATELYN SAXSON, AMY C. CLINTON, AND ALLISON Adv. Pro. No.: 14-01929 (REG) C. CLINTON, on behalf of themselves, and all others similarly situated, Plaintiffs, -V-GENERAL MOTORS LLC, Defendant.

NOTICE OF SETTLEMENT OF SCHEDULING ORDER REGARDING (I) MOTION OF GENERAL MOTORS LLC PURSUANT TO 11 U.S.C. §§ 105 AND 363 TO ENFORCE THE COURT'S JULY 5, 2009 SALE ORDER AND INJUNCTION, (II) OBJECTION FILED BY CERTAIN PLAINTIFFS IN RESPECT THERETO, AND (III) ADVERSARY PROCEEDING NO. 14-01929

PLEASE TAKE NOTICE that, pursuant to Rule 9074-1 of the Local Rules of Bankruptcy Procedure for the Southern District of New York, the proposed scheduling order, a copy of which is annexed hereto, with respect to the Conference held before the Court on May 2, 2014, will be presented for signature and entry to the Honorable Robert E. Gerber, United States Bankruptcy Judge, in Room 523 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004 on May 15, 2014 at 12:00 noon (Eastern Time).

PLEASE TAKE FURTHER NOTICE that objections or proposed counter-orders must be made in writing and shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and shall be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-242 (which can be found at www.nysb.uscourts.gov) by registered users of the Bankruptcy Court's filing system, and (b) by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with a hard copy delivered directly to Chambers), in accordance with General Order M-182 (which can be found at www.nysb.uscourts.gov), and served in accordance with General Order M-242, and on (i) King & Spalding LLP, 1185 Avenue of the Americas, New York, New York 10036 (Attn: Arthur Steinberg, Esq.); (ii) Kirkland & Ellis LLP, 300 North LaSalle Street, Chicago, Illinois 60654 (Attn: Richard C. Godfrey, Esq.); (iii) Golenbock Eiseman Assor Bell& Peskoe LLP, 437 Madison Avenue, New York, New York, New York 10022 (Attn: Jonathan L. Flaxer, Esq.); (iv) Brown

Rudnick LLP, Seven Times Square, New York, New York 10036 (Attn: Edward S. Weisfelner, Esq.); (v) Stutzman, Bromberg, Esserman & Plifka, 2323 Bryan Street, Suite 2200, Dallas, Texas 75201-2689 (Attn: Sander L. Esserman, Esq.); (vi) Caplin & Drysdale, 600 Lexington Avenue, 21st Floor, New York, NY 10022 (Attn: Elihu Inselbuch, Esq. and Peter Van N. Lockwood, Esq.); (vii) Gibson, Dunn & Crutcher LLP, 200 Park Avenue, New York, NY 10166-0193 (Attn: Keith R. Martorana, Esq. and Matt J. Williams, Esq.); and (viii) Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, New York 10036-6745 (Attn: Daniel H. Golden, Esq.), so as to be received no later than **May 15, 2014, at 11:30 a.m.** (**Eastern Time**).

Dated: New York, New York May 12, 2014

Respectfully submitted,

/s/ Scott I. Davidson

Arthur Steinberg Scott Davidson KING & SPALDING LLP 1185 Avenue of the Americas New York, New York 10036 Telephone: (212) 556-2100

Telephone: (212) 556-2100 Facsimile: (212) 556-2222

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Attorneys for General Motors LLC